

JEAN E. WILLIAMS, Acting Assistant Attorney General
Environment & Natural Resources Division
JEFFREY S. THOMAS, Trial Attorney (VA Bar No. 86439)
Natural Resources Section
United States Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
Telephone: (202) 514-3553
Facsimile: (202) 305-0506
jeffrey.thomas2@usdoj.gov
Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

HOOPA VALLEY TRIBE,

Plaintiff,

v.

UNITED STATES BUREAU OF RECLAMATION; DAVID BERNHARDT, in his official capacity as Secretary of the Interior; BRENDA BURMAN, in her official capacity as Commissioner of the United States Bureau of Reclamation; ERNEST CONANT, in his official capacity as U.S. Bureau of Reclamation California-Great Basin Regional Director; and UNITED STATES DEPARTMENT OF THE INTERIOR

Defendants.

Case No. 1:20-cv-01814-DAD-EPG

FEDERAL DEFENDANTS' MOTION TO CONSOLIDATE

NOTICED TO JULY 6, 2021

TO ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that on July 6, 2021, at 9:30 a.m., or as soon thereafter as counsel may be heard, in the courtroom of the Honorable Dale A. Drozd, located in the United States District Court for the Eastern District of California, Fresno Division, Federal Defendants will and hereby do move to consolidate this case with *North Coast Rivers Alliance v. United*

States Department of the Interior, No. 1:16-cv-00307-DAD-SKO (hereinafter, “N. Coast”) and *Center for Biological Diversity et al. v. United States Dept. of the Interior et. al.*, 1:20-cv-706-DAD-EPG (“CBD”). Federal Defendants do not request oral argument and believe the motion can be decided on the papers.

FEDERAL DEFENDANTS’ MOTION TO CONSOLIDATE

Federal Defendants respectfully request that the Court consolidate this case with *N. Coast* and *CBD* for the reasons stated in the memorandum in support. Defendants conferred with counsel for Plaintiff and Plaintiff opposes this motion.

DATED: May 24, 2021.

Respectfully submitted,

JEAN E. WILLIAMS, Acting Assistant Attorney General
United States Department of Justice
Environment & Natural Resources Division

/s/ J. Scott Thomas
JEFFREY SCOTT THOMAS
Trial Attorney
U.S. Department of Justice
Counsel of Record for the Federal Defendants

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2021, I electronically filed the foregoing document and its attachment with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all parties.

/s/ J. Scott Thomas
JEFFREY SCOTT THOMAS